

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
Gregory S. Kinoian, Esq.
dstolz@genovaburns.com
dclarke@genovaburns.com
gkinoian@genovaburns.com
110 Allen Road, Suite 304
Basking Ridge, NJ 07920
Tel: (973) 533-0777
Fax: (973) 533-1112
Local Counsel for the Official Committee of Talc Claimants

BROWN RUDNICK LLP

David J. Molton, Esq.
Michael S. Winograd, Esq.
Susan Sieger-Grimm, Esq.
Kenneth J. Aulet, Esq.
dmolton@brownrudnick.com
mwinograd@brownrudnick.com
ssieger-grimm@brownrudnick.com
kaulet@brownrudnick.com
Seven Times Square
New York, NY 10036

Tel: (212) 209-4800
Fax: (212) 209-4801
And-

Jeffrey L. Jonas, Esq.
Sunni P. Beville, Esq.
Eric R. Goodman, Esq.
jjonas@brownrudnick.com
sbeville@brownrudnick.com
egoodman@brownrudnick.com

One Financial Center
Boston, MA 02111
Tel: (617) 856-8200
Fax: (617) 856-8201
Co-Counsel for the Official Committee of Talc Claimants

OTTERBOURG PC

Melanie L. Cyganowski, Esq.
Jennifer S. Feeney, Esq.
Michael R. Maizel, Esq.
mcyganowski@otterbourg.com
jfeeney@otterbourg.com
mmaizel@otterbourg.com
230 Park Avenue
New York, NY 10169
Tel: (212) 905-3628
Fax: (212) 682-6104
Co-Counsel for the Official Committee of Talc Claimants

MASSEY & GAIL LLP

Jonathan S. Massey, Esq.
Rachel S. Morse, Esq.
jmassey@masseygail.com
rmorse@masseygail.com
1000 Maine Ave. SW, Suite 450
Washington, DC 20024
Tel: (202) 652-4511
Fax: (312) 379-0467
Co-Counsel for the Official Committee of Talc Claimants

In re:
LTL MANAGEMENT, LLC,¹
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**FIRST INTERIM APPLICATION FOR ALLOWANCE OF POST-DISMISAL FEES
AND REIMBURSEMENT OF EXPENSES TO GENOVA BURNS, LLC
FOR THE PERIOD AUGUST 12, 2023 THROUGH JANUARY 31, 2024**

TO: THE HONORABLE MICHAEL B. KAPLAN
UNITED STATES BANKRUPTCY JUDGE

The Application of GENOVA BURNS LLC (“Genova Burns”), local counsel to the Official Committee of Talc Claimants (“TCC”), respectfully states to the Court as follows:

1. The members and associates of Genova Burns are all attorneys at law of the State of New Jersey and are duly admitted to practice before this Court.
2. On April 4, 2023, the Debtor filed a Voluntary Chapter 11 Petition in the United States Bankruptcy Court for the District of New Jersey [dkt #1].
3. On April 14, 2023, a Notice of Appointment of the Official Committee of Talc Claimants was entered [dkt #162]. Genova Burns was retained to serve in the capacity of local counsel to the Official Committee of Talc Claimants by Order of this Court dated June 12, 2023 [dkt #754], which retention was effective April 14, 2023. A copy of such retention Order is annexed hereto as Exhibit "A".
4. On August 11, 2023, the within Chapter 11 proceeding was dismissed and the Debtor filed an appeal.
5. The within Application represents Genova Burns’ First Interim Post-Dismissal Application for Compensation as local counsel to TCC and covers the period August 12, 2023 through January 31, 2024.
6. Genova’s computerized time sheets, previously filed with the Monthly Fee Statements covering the Application Period (as referenced below), detail the services rendered by the members and associates of Genova, the hourly rate charged by each member, associate or

paralegal, and the actual time expended in the performance of such services. Attached as Exhibit "B" are additional timesheets of Genova Burns, which represents necessary, non-appellate administrative tasks performed by Genova Burns during this time period, but were not presented on Monthly Fee Statements, which total an additional \$30,400.00 in fees, and \$215.60 in expenses. Total of said time reflect that Genova Burns has expended 204.60 hours in performing services for TCC, resulting in charges of \$125,415.00. The blended hourly rate charged herein is \$612.98 which your applicant believes is fair and reasonable in light of the nature of the services rendered and the expertise of the professionals rendering such services.

7. As previously submitted with the monthly fee statements and in the attached Exhibit B, out of pocket disbursements incurred by Genova Burns in the performance of its duties as local counsel to TCC total \$4,728.20.

8. Monthly Fee Statements were prepared and served pursuant to the Administrative Fee Order Establishing Procedures for Allowance of Interim Compensation and Reimbursement of Expenses of Professionals entered on May 22, 2023.

Date	Fees	Less 20%	Fee Payment Requested	Payment Received (fees & expenses)	Expense Reimbursement (100%)
August 12-31, 2023 (Dkt #1421)	\$19,325.00	(\$3,865.00)	\$15,460.00	\$15,460.00	\$0.00
September 2023 (Dkt #1542)	\$13,732.50	(\$2,746.50)	\$10,986.00	\$10,730.00	\$0.00
October 2023 (Dkt #1592)	\$24,435.00	(\$4,887.00)	\$19,548.00	\$14,841.05	\$780.05

November 2023 (Dkt #1610)	\$14,610.00	(\$2,922.00)	\$11,688.00	\$11,114.76	\$0.00
December 2023 (Dkt #1646)	\$15,255.00	(\$3,051.00)	\$12,204.00	\$15,493.79	\$3,716.55
January 2024 (Dkt #1684)	\$7,977.50	(\$1,595.50)	\$6,382.00	\$0.00	\$16.00

9. Annexed hereto and made part hereof as Exhibit "C" is the Affidavit of Daniel M. Stoltz, submitted in accordance with the provisions of Section 504 of the Bankruptcy Code.

10. The Order of the Court dismissing the LTL Chapter 11 case provided that the TCC remained in existence for all appellate matters, and that the TCC professionals would be compensated by the Debtor for such services.

11. Subsequent to dismissal of the Chapter 11 case, your applicant was required to perform significant services unrelated to appeals. Those services primarily related to coordination and filing of all final fee applications of the TCC professionals, as well as seeking payment of the pre-dismissal expenses of TCC members. Your applicant has served as a single source of communication with LTL's counsel, specifically James Lawlor, Esq., who is responsible for the resolution of any disputes with regard to final feel applications of the TCC professionals. Shortly after the first monthly post-dismissal bills were submitted to the Debtor for payment, your applicant engaged in communications with the Debtor, through Mr. Lawlor, with regard to the non-appellate essential services being rendered by your applicant. An agreement was reached, pursuant to which these non-appellate services would be paid at a rate of 50%. With regard to most monthly billings which have been submitted ot the Debtor, the Debtor has paid 80% of the

fees for appellate services, and 50% of the services for non-appellate services. In the within fee application, your applicant similarly seeks full payment, including the 20% holdback, for all appellate services, and 50% of the fees generated with regard to non-appellate services.

Total Fees	Total appellate work	50% payment of non-appellate work	Total Fees Requested	Expense Reimbursement (100%)
\$125,415.00	\$56,585.00	\$34,415.00 (50% of \$68,830.00)	\$91,000.00	\$4,728.20

WHEREFORE, Genova Burns respectfully requests the entry of the annexed Order, granting a interim allowance of compensation in the amount of \$125,415.00, together with reimbursement of actual out-of-pocket disbursements in the amount of \$4,728.20, for a total award of \$130,143.20, less the amount agreed upon for 50% of necessary, non-appeal work as per above chart.

Respectfully submitted,

GENOVA BURNS LLC

By: /s/ Daniel M. Stolz
DANIEL M. STOLZ

Dated: April 4, 2024